

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11
: Case No. 02-12986 (MFW)
GENTEK INC., et al., :
and NOMA COMPANY, : Jointly Administered
Debtors. : Related to Docket Nos. 2689, 2701
- - - - - x

APPELLEES' DESIGNATION OF ADDITIONAL
ITEMS TO BE INCLUDED IN RECORD ON APPEAL

GenTek Inc. ("GenTek") and GenTek Holding, LLC (f/k/a General Chemical Corporation) ("GenTek Holding" or "General Chemical" and, together with GenTek, the "Reorganized Debtors"), reorganized debtors in the above-captioned chapter 11 cases, and JPMorgan Chase Bank, N.A., in its capacity as administrative agent for the Lenders under the GenTek Credit Agreement (together with the Reorganized Debtors, the "Appellees"), hereby designate, pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the following additional items to be included in the record of the appeal of Tony Newman and Dorothy Lenoir (together, the "California Plaintiffs") of the order entered August

11, 2005 (Docket No. 2687) enjoining the California Plaintiffs from prosecuting certain fraudulent transfer claims:¹

| Tab | Date | Document |
|-----|----------|--|
| 1 | 8/28/03 | Disclosure Statement With Respect to Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1248) |
| 2 | 10/3/03 | First Modification to Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1444) |
| 3 | 10/3/03 | Declaration of Richard F. NeJame in Support of Confirmation of Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1440) |
| 4 | 10/3/03 | Declaration of Matthew R. Friel in Support of Confirmation of Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1442) |
| 5 | 10/3/03 | Debtors' Memorandum of Law in Support of Confirmation of Joint Plan of Reorganization (Docket No. 1450) |
| 6 | 10/20/03 | Transcript of Hearing Held October 7, 2003 (Docket No. 1530) |
| 7 | 5/26/05 | Order for Extension of Time (Docket No. 2678) |

¹ For purposes of this designation of record, all references to docket numbers include not only the lead document but also all secondary documents filed therewith, including pleadings, memoranda, affidavits, certificates of service and exhibits contained in the docket entry.

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| 8 | 5/26/05 | Order Granting GenTek Inc. and GenTek Holding, LLC Leave to File Reply to Objection of Tony Newman and Dorothy Lenoir to the Motion of GenTek Inc. and GenTek Holding, LLC for Order Enforcing Plan of Reorganization et al. and the Joinder of JPMorgan Chase Bank, N.A. (Docket No. 2679) |
| 9 | 8/23/05 | Declaration of Service (Docket No. 2691) |

RESERVATION OF RIGHTS

The Appellees expressly reserve their rights to object to or otherwise to move to strike or to modify some or all of any designation of items to be included in the record on appeal that have been or might later be submitted by any other party.

Dated: Wilmington, Delaware
November 28, 2005

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP
D. J. Baker
Rosalie Walker Gray
Four Times Square
New York, New York 10036
(212) 735-3000

- and -

je M.

Mark S. Chehi (I.D. No. 2855)
Jane M. Leamy (I.D. No. 4113)
David R. Hurst (I.D. No. 3743)
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899
(302) 651-3000

Attorneys to Reorganized Debtors

- and -

O'MELVENY & MYERS LLP
Debra S. Belaga
Stephen H. Warren
Brian M. Metcalf
275 Battery Street, Suite 2600
San Francisco, California 94111
(415) 984-8700

Special Litigation Counsel to
Reorganized Debtors

- and -

RICHARDS LAYTON & FINGER, P.A.



Mark D. Collins (I.D. No. 2981)
One Rodney Square
P.O. Box 551
Wilmington, Delaware 19899
(302) 651-7700

-and-

Kenneth S. Ziman
William T. Russell, Jr.
Robert H. Trust
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, New York 10017
(212) 455-2000

Attorneys for JPMorgan Chase
Bank, N.A., as Administrative
Agent for the Lenders

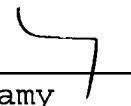
CERTIFICATE OF SERVICE

I, Jane M. Leamy, hereby certify that on this 28th day of November 2005, I caused the foregoing **Appellees' Designation of Additional Items to be Included in the Record on Appeal** to be served on the parties listed below, by first-class mail, postage prepaid:

Joseph Grey
Stevens & Lee, P.C.
1105 North Market St.
7th Floor
Wilmington, DE 19801

R. Patrick Jarress
Jaress & Leong
737 Bishop Street
Suite 2920
Honolulu, HI 96813

David Buchbinder, Esq.
Office of the United
States Trustee
844 King Street, Suite
2207
Wilmington, DE 19801

Jane M 
Jane M. Leamy